

September 15, 2014

By ECF

Honorable Naomi Reice Buchwald
United States District Judge
United States Courthouse
500 Pearl St.
New York, NY 10007-1321

Re: U.S. Bank National Association v. Commonwealth Land Title Ins. Co., Civ. No. 13 CIV 7626

Dear Judge Buchwald:

I am writing to request an additional extension of time to take the depositions of Fay Farkas and Sarah Gluckman and permission to take the depositions remotely.

By Order dated September 5, 2014 (Doc. Entry 55), this Court granted my request for an extension until October 15, 2014 to complete those depositions. I scheduled those depositions for September 24th. I received a call today from Jeremy Rosenberg, new counsel for Ms. Farkas. Mr. Rosenberg explained that he has a scheduling conflict on September 24th. He also explained that he and Ms. Farkas are observant Jews, and that he would appreciate it if I could reschedule Ms. Farkas's deposition after the Jewish holidays of Rosh Hashanah, Yom Kippur and Sukkot. Sukkot concludes on October 15, 2014. Unfortunately, I am scheduled to be in trial during the last three weeks in October. Therefore, I respectfully request that the Court grant an additional extension until the end of November 2014 so that I might complete the depositions of Ms. Farkas and Ms. Gluckman. I would in turn consent to any additional extension of the dispositive motion deadline.

In addition, I respectfully request the Court's permission to participate in these depositions remotely, either by telephone or video conference Pursuant to Local Civil Rule 30.02, "The motion of a party to take the deposition of an adverse party by telephone or other remote means will presumptively be granted."

Respectfully submitted,



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cc: David Fiveson, Esq. (By ECF)
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